

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,
as representative of
THE COMMONWEALTH OF PUERTO
RICO, *et al.*,
Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**MOTION SUBMITTING CERTIFIED TRANSLATIONS IN CONNECTION WITH
RAMHIL DEVELOPERS INC.'s OBJECTION TO DOCKET NO. 19353 AND INFORMING
CURE AMOUNTS FOR EXECUTORY CONTRACTS OR UNEXPIRED LEASES TO BE
ASSUMED PURSUANT TO TITLE III PLAN OF ADJUSTMENT**

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW Ramhil Developers, Inc. ("Ramhil"), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On January 18th, 2022, Ramhil filed an *Objection to Docket No. 19353 and Informing Cure Amounts for Executory Contracts or Unexpired Leases to be Assumed Pursuant to Title III Plan of Adjustment* (the "Objection to Cure Amounts"). (ECF No. 19807).

2. Pursuant to the filed motion, Ramhil requested leave to file twelve (12) Exhibits in their original Spanish language and to subsequently submit certified translations within the next thirty (30) days in order to comply with the applicable legal requirements. (ECF No. 19808).

3. On January 20, 2022, this Honorable Court granted until February 17, 2022, for Ramhil to submit certified translations of the exhibits. (ECF No. 19843).

4. On February 17, 2022, Ramhil submitted eleven (11) out of twelve (12) certified translation of the exhibits to the Objection to Cure Amounts. (ECF No. 20163). Specifically, Ramhil submitted the following English translations:

- a. Exhibit #2, Development Agreement
- b. Exhibit #4, Ramhil's Proposal
- c. Exhibit #6, Infracity Report dated March 11, 2014
- d. Exhibit #7, Infracity Report dated January 28, 2014
- e. Exhibit #8, Parking Rent Invoice (Post-Petition)
- f. Exhibit #9, Parking Rent Invoice (Pre-Petition)
- g. Exhibit #10, OCA Letter to Ramhil dated September 19, 2012
- h. Exhibit #11, OCA Letter to Ramhil dated February 15, 2013
- i. Exhibit #12, Substantial Completion Certificate and Use Permit
- j. Exhibit #13, LED Lamps Pre-Petition Invoice
- k. Exhibit #14, Change Orders and Letter of Approval

5. For reasons out of Ramhil's control, the group in charge of the translations was not able to complete on time the translation of Exhibit #1, Lease Agreement. Therefore, Ramhil requested this Court to allow it to file the translation of Exhibit #1, Lease Agreement, on or before February 22, 2022, at 5:00 p.m. (Atlantic Standard Time). Further, Ramhil informed this Court that the undersigned conferred with Debtor's counselors, and that they agreed to the requested time extension. (ECF No. 20163).

6. On February 18, 2022, this Honorable Court granted Ramhil's request for a time extension and directed Ramhil to file a certified English translation of Exhibit #1 to the Objection to Cure Amounts on or before February 22, 2022, at 5:00 p.m. (ECF No. 20169).

7. In compliance with this Court's Order, Ramhil hereby submits a certified English translation of Exhibit #1 to the Objection to Cure Amounts and requests this Honorable Court to accept it.

8. Further, Ramhil informs this Honorable Court that, by error or inadvertence, it filed an English translation of Exhibit #7, Infracity Report dated January 28, 2014, which lacked its certification of translation. Therefore, through the present motion Ramhil submits a certified English translation of Exhibit #7 to the Objection to Cure Amounts and requests this Honorable Court to accept it.

WHEREFORE, Ramhil respectfully requests that this Court take notice of the above, deem the Order as complied with, and accept the attached certified translations of the Exhibits to the Objection to Cure Amounts.

Certificate of Service: I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system which will send notification of such filing to the CM/ECF participants and parties in interest as per master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of February, 2022.

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